

 Jefferson Lab <small>Thomas Jefferson National Accelerator Facility</small>		TITLE:		INDEPENDENT ASSESSMENT CORRECTIVE ACTION PLAN		
		ASSESSMENT #		N/A		Page 1 of 4
ASSESSMENT TITLE		Validation Report of TJNAF Environmental Management System			DATE	April 2009
DIVISION	ESH&Q		DEPARTMENT/GROUP	Environmental		

Finding ID#	Observation	Corrective Action	Person Responsible	Expected Completion Date
P2-001	A Priority 2 finding was noted regarding overall implementation of the EMS. Based on interviews with staff and review of documents, a general reluctance to participate in the EMS was noted. Staff appeared competent and generally embraced environmental improvement. However, contrary to the contractual implementation requirements and the stated intent of Executive Order 13423, the EMS, while documented, is not routinely being used as the primary system for accomplishing and documenting the goals of the ISO 14001, Executive Order 13423, and DOE orders at JLab. For example, several environmental improvements are being implemented, but are not documented within the framework of the EMS.	Develop an Implementation Plan to revise the EMS Plan and implementing documents to clarify the management system and to tailor system activities to JLab. Documents (and resulting processes) will be revised to: (a) better reflect ISO 14001 terminology (b) result in a more appropriate significant aspect list (c) result in more efficient, lab-wide generation of objectives and targets (d) document the rationale when objectives and targets are not Appropriate (IA-2009-32-02)	B. Rainey	6/15/09

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P2-002	Another Priority 2 finding was identified regarding failure to meet the Contract Implementation Action Plan for DOE O 450.1A, pursuant to contract modification A069. A commitment for full compliance by April 1, 2009 was not met. The EMS Plan was not in place as of the self-imposed implementation date, April 1, 2009. The Plan was not signed until April 23, 2009, and the approved plan was not provided to the Audit Team until April 30, the last day of the audit. There is limited evidence that the plan had appropriate JLab management attention.	Select / develop and implement a tool for tracking high level EMS deliverables (legal and contractual) (IA-2009-32-04)	B. Rainey	8/3/09

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P3-001	<p>A Priority 3 finding was identified regarding inconsistencies in development of EMS documentation. The Environmental Management Procedure that addresses Environmental and Significant Environmental Aspects resulted in the identification of a disproportionate number of significant aspects for this low-hazard, non-nuclear facility. Improvements are necessary to the methodology used to determine an aspect and its significance level. Significant aspects and aspect categories defined in the JLab EMS are also inconsistent with the terminology used in the ISO 14001 standard. This may have also contributed to the high number of significant aspects. The Environmental Management Procedure (EMP) that addresses targets and objectives did not result in the establishment of a reasonable number of targets and objectives that would be expected of a program compliant with DOE O450.1A, DOE O 430.2B and ISO 14001. This EMP documentation must ensure that JLab and the EMS Committee Members in particular, are better informed of the need for and status of objectives and targets to best accomplish DOE's EMS related goals. This EMP should also provide a mechanism to ensure and document the screening process of significant aspects for opportunities to develop objectives and targets. Standard operating procedures that implement EMS documents in the field have 3 year expiration dates. This documentation requirement was inconsistent with a field visit observation, as a vacuum technician produced a standard operating procedure for the use of vacuum pump oil that was dated.</p>	<p>Identify the significant aspects at other low-hazard, non-nuclear DOE facilities to validate the output of the revised JLab process resulting from action P2-001-1 (IA-2009-32-05)</p>	B. Rainey	9/25/09

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